Q Okay. But, Dr. Brody, is there anywhere in any of the presentations that you have made, any article that you have published where you present yourself to your peers as being an expert in carcinogenesis?

A It's sort of the same answer. I don't hold myself out to my peers as an expert in anything. They'll decide what I'm an expert in by what I write and what I say.

Q Okay. So that's fine, which would then mean that when you attend conferences, you're never introduced as an expert in carcinogenesis?

A I don't think I've ever been introduced as an expert in anything. I -- you know, this is just not the lingo, jingoism that we use.

Q Okay. Have you ever said that you are an expert in the field of oncology?

A Same answer.

Q Have you ever said that you're an expert in the field of fibrogenesis? Have you ever said that?

A Maybe in court I have.

Q You've never said that to your -- you've never said that to peers or to people with whom -- to whom you're introduced in scientific circles that you are an expert in fibrogenesis? You never said that?

A You know, I'm just trying to think of the setting. If I'm in a study section in the anti-age, and we go around the table

and we're asked what our expertise is, then I certainly would've said that. Sure.

Q Okay. You would've said that your expert is in fibrogenesis, and did you ever in the context of the very roundtable discussion that you've just now talked about said, I am an expert in carcinogenesis?

A Probably not.

Q Okay. Now, I want to talk a little bit about something else, which is that in this same website, you talk about your focus on fibrogenesis, and in particular you deal with the biochemical and molecular mechanisms that mediate fibroproliferative lung disease, right?

A Yes.

Q And so when we talk about your particular area and focusing on fibrosis, you're a person who has looked into the mechanisms, correct?

A That's right.

Q Well, let's talk a little bit about mechanisms. First of all, talk about the mechanism for fibrosis. You've described that mechanism for fibrosis in many, many papers, correct?

A Yes.

Q And in that mechanism -- and I know that I'm going to be grossly oversimplifying what you've said, but just bear with me for a second to see if I at least get the direction kind right. You, first of all, talk about the inhalation of the fibers,

right?
A Yes.
Q Then you talk about their transport to tissue, right?
A Right.
Q Then you talk about their -- the reactions of cells that assist in the transportation. For example, you've talked about macro -- I always thought they were macro -- when I read it, I thought it was macrophage (pronouncing). It's macrophage?
A Either way.
Q Okay. And macrophages are those gobbling up cells, and they also serve the function of not only gobbling things up but moving them along. Right?
A Right.
Q So they're part of the transportive process. Correct?
A Sure.
Q And any time -- any time you have a foreign material introduced into the human body, the macrophages will be recruited, and they'll try to gobble it up no matter how big it is.
A True.
Q Okay. And then, ultimately, the macrophages plus other means of transportation will take the material to a target or to an area, and at that area you will have a cellular or tissue reaction. Right?
A That's fine.

Q So far so good?
A That's close, yes.
Q Okay. That's good enough for this morning. And what I have said, that basic transportation system works for all asbestos fiber types, that is chrysitolite, amphiboles -- amosite, chrysitolite, chrysotile?
A Correct.
Q And it works for all amounts of fiber albeit the amount can affect how far it gets transported. Correct?
A True.
Q Okay. Now, would you also agree with me that when it comes to the mechanism with respect to fibrosis, that it's very difficult to study this mechanism in people?
A True.
Q So that what you do is you set up a series of animal and laboratory experiments that are designed to see if you can watch this mechanism observe the mechanism at work. Correct?
A Right.
Q And is it true that in those animals -- and indeed that's the focus of your research. You're not a person -- you're not an M.D., correct?
A Right.
Q And your -- the focus of your work is not examining patients in the clinical setting, correct?
A Right.

Q You're the person who is in the lab looking for a different line of research that takes you into mechanisms that may not actually be observable clinically. Fair?
A Fair.
Q Okay, and, Dr. Brody, when you're in that laboratory and you have those animals or you have cells, you don't get anywhere unless you use enough of the material to get some kind of response. Correct?
A Right.
Q And, therefore, when you do the experiments that you've talked about and you've taken pictures of, some of which you've now shown here in court, you're talking about experiments with animals that by and large involve very high doses or concentrations of asbestos. Correct?
A Well, it's not doses or concentrations. It's high concentrations, but it's actually quite a small dose, because they're exposed for a short time.
Q Okay, so short duration, high concentration. Correct?
A Correct.
Q Fair enough. Right?
A Right.
Q Okay. And when you have this cell, this in the petri dish and you put a fiber right by the cell, that's kind of, you know, you're placing it right in proximity to the very kinds of materials where you want to see if that little cell binds to

the fiber. Right?
A Exactly.
Q Okay. So you really -- you're idealizing the proximity of those fibers to those cells at precisely the time that they're dividing, so you can see if the cell's right there, will that chromosomal material will adhere to the fiber? Correct?
A Exactly.
Q Okay, and you've shown us pictures taken at the time where that adheres. Now, true enough that many, many different kinds of biological materials will adhere to fibers?
A Certainly.
Q And indeed they'll adhere to fibers of all different kinds -- all different kinds and types. Correct?
A Sure.
Q So would you agree with me that what you've observed in the laboratory with respect to cells and what you've observed in the laboratory with respect to animals; that is, the recruitment of these different things, are -- well, let me just ask with respect to cells, first of all. Would you agree with me that the photographs that you took showing the binding effect, that doesn't show -- the photographs themselves don't show a binding effect that is specific to any particular type of asbestos. Correct?
A I agree.
Q Would you also agree that it's also not specific even to

asbestos, that you could take the same photographs and show the same kind of binding effect with respect to other materials that are not asbestos form?

A I agree.

Q In fact, you could find that binding effect with respect to glass fibers. Correct?

A Sure.

Q Okay. And, in fact, that binding effect -- the very fact that you've seen binding effects between proteins and foreign materials is again a feature of the body that is very, very generalized. We see that really all over the place in many different contexts. Correct?

A Sure, that's why you have to do a series of different kinds of experiments; cellular, animal, and epidemiology.

Q Okay. We're going to get to exactly that sequence, but I just wanted to begin with respect to the cell work. Let's talk a little bit about animals. When you observe the fibrosis that you see in animals, that fibrosis is again not necessarily specific to asbestos. Correct?

A Well, I mean it is, because I gave him asbestos, but what you mean is that response can occur with -- from agents other than asbestos.

Q Right.

A A few others, sure.

Q Okay. So now let's deal with one more general point with

respect to the mechanism of fibrosis. We covered a lot of different things here, but one thing I want to get to, I take it that your belief and -- not just your belief, your assessment today is that when it comes to the mechanism of fibrosis with respect to asbestos, that is well-established. Would you agree with that or not?

A Yes.

Q Indeed you say that pretty much in the expert report that you filed in connection with this case. Correct?

A I don't remember if I said that, but it -- but it's true. It is.

Q Well, and if that's true, that's something that's only happened in the last few years, because not so long ago you represented that the -- or you wrote that the mechanisms by which asbestos causes fibrosis remain unclear. That's been your position in your published papers, correct?

A And it still is if you're dealing at a specific level. In other words, you're talking apples and oranges. So there are many different levels to understand a process. So if I want to tell you do I know the complete set of genes that must be up regulated for scar tissue to result, no, I'll tell you that we have other things to learn, and that's what I'm saying in a paper like that.

Q Yes, well, showing you Exhibit 766, which is a paper where the lead author was a Neil Mishra, and it was written as